

AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY PROGRAM MANAGEMENT PLAN

This Management Plan implements DODI 4715.7, Environmental Restoration Program and the 14 June 1993 Memorandum of Understanding (MOU) between the Department of Defense (DOD) and the Agency for Toxic Substances and Disease Registry (ATSDR), extended on 29 September 1995, by an amendment until 30 September 2000. It provides guidance for the Department of Defense activities related to ATSDR. Send comments and suggested improvements to Cdr, USACHPPM, ATTN: MCHB-DC-E (ATSDR DOD Lead Agent), 5158 Blackhawk Road, Aberdeen Proving Ground, MD 21010-5422.

Section A -- Background

1. Legal Mandate:

1.1. The Agency for Toxic Substances and Disease Registry (ATSDR) must perform public health assessments (PHA) and other health-related activities under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980 as amended by the Superfund Amendments and Re-authorization Act (SARA) of 1986, Section 104(i). Pursuant to the act, ATSDR and Department of Defense (DOD) are required to enter into a Memorandum of Understanding (MOU)(Appendix A) to conduct PHAs, toxicological profiles, and other health-related activities.

1.2. PHAs and health studies are being performed by ATSDR at Federal, DOD, and private facilities listed on or proposed for the US Environmental Protection Agency's (EPA) National Priorities List (NPL) of hazardous waste sites. For formerly Used Defense Sites the PHAs are only funded by DOD when DOD is designated as the lead Potentially Responsible Party for the response action.

1.3. ATSDR may also perform PHAs at non-NPL sites when petitioned by individual persons or licensed physicians, and perform health consultations and health education activities at any DOD site when requested by DOD.

1.4. While the ATSDR is not a regulatory agency, the EPA and other enforcement authorities (i.e., states) may elect to adopt ATSDR recommendations as their own requirements.

Section B -- Responsibilities

2. The Deputy Under Secretary of Defense (Environmental Safety) [DUSD(ES)]:

- 2.1. Establishes the MOU with ATSDR in coordination with the DOD components, as per DODI 4715.7
- 2.2. Provides policy and overall direction for the ATSDR program and activities within DOD.
- 2.3. The DUSD(ES) has designated the Deputy Assistant Secretary of the Army (Environmental, Safety and Occupation Health) [DASA (ESOH)] as the lead agent for the program.

3. Deputy Director, Corporate Administration, Defense Logistics Agency (DLA):

- 3.1. Provides policy and overall direction for the ATSDR program and activities within the DLA.
- 3.2. Actively participates with ATSDR in health-related activities, as identified in the DOD-ATSDR MOU.
- 3.3. Appoints DLA ATSDR Liaison Officer.
- 3.4. Ensures budgeting and programming of the Environmental Restoration Account (ERA) and Base Realignment and Closure (BRAC) Account funding to support DLA's portion of the ATSDR program.
- 3.5. Reviews and approves the ATSDR Annual Plan of Work (APOW).

4. The Deputy Assistant Secretary of the Army (Environment, Safety, and Occupational Health):

- 4.1. The DASA(ESOH) has designated USACHPPM to serve as the DOD Lead Agent for the ATSDR program.
- 4.2. Provides policy and overall direction for the ATSDR program and activities within the Army.
- 4.3. Actively participates with ATSDR in health-related activities, as identified in the DOD-ATSDR MOU.
- 4.4. Appoints Department of Defense Lead Agent and Army ATSDR Liaison Officer.
- 4.5. Ensures budgeting and programming of the ERA, BRAC Account and the Formerly Used Defense Sites Program funding to support the Army's portion of the ATSDR program.
- 4.6. Reviews and approves the ATSDR APOW.

5. The Deputy Assistant Secretary of the Air Force (Environmental, Safety, and Occupational Health):

- 5.1. Provides policy and overall direction for the ATSDR program and activities within the Air Force.
- 5.2. Actively participates with ATSDR in health-related activities as identified in the DOD-ATSDR MOU.
- 5.3. Appoints Air Force ATSDR Liaison Officer.
- 5.4. Ensures budgeting and programming of the ERA and BRAC Account funding to support the Air Force's portion of the ATSDR program.
- 5.5. Reviews and approves the ATSDR APOW.

6. The Deputy Assistant Secretary of the Navy (Environmental and Safety)

- 6.1. Provides policy and overall direction for the ATSDR program and activities within the Navy.
- 6.2. Actively participates with ATSDR in health-related activities as identified in the DOD-ATSDR MOU.
- 6.3. Appoints Navy ATSDR Liaison Officer.
- 6.4. Ensures budgeting and programming of the ERA and BRAC Account funding to support the Navy's portion of the ATSDR program.
- 6.5. Reviews and approves the ATSDR APOW.

7. U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM)

- 7.1. Establishes and chairs, in accordance with Section 4.1.1.1.) of the MOU, an ATSDR Component Working Group that is made up of the appointed ATSDR Liaison Officers, as noted in Sections 3 through 6.
- 7.2. Coordinates and reports on ATSDR activities for the DOD through the Annual Plan of Work (APOW) and in-progress reviews.
- 7.3. Provides oversight of ATSDR activities and apprises Components of these activities.
- 7.4. Executes the MOU between DOD and ATSDR.

7.5. Coordinates and consolidates comments on ATSDR's Annual Plan of Work (APOW) and finalizes for approval by the Secretariat Offices and coordinates any subsequent amendments to the APOW with the ATSDR Component Working Group.

7.5.1. Distributes APOW to, ATSDR Component Working Group for review and preliminary approval for the proposed APOW and funding requirements.

7.5.2. Upon ATSDR Component Working Group approval, distributes APOW to Secretariat Offices for coordination and approval.

7.6. Serves as first line dispute resolution authority between Components and ATSDR.

7.7. Monitors progress on implementation of "Guidelines for Coordination of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Activities Between Agency for Toxic Substances and Disease Registry and Department of Defense, February 1995" (Guidelines) to include recommendations and follow-up activities.

7.8. Maintains repository for ATSDR documentation for DOD to include official correspondence and copies of all health consultations, public health assessments, health studies, petition letters and health education documents.

7.9. Develops budget estimates for the resources to support ATSDR requirements and recommendations. Distributes these estimates to ATSDR Component Working Group, the Service Liaisons, for their consideration.

7.10. Obtains from the Components and distributes funding to ATSDR for the execution of the APOW.

7.11. Conducts at least three meetings per year with ATSDR and Component Liaison Officers to review progress and to set program priorities.

7.11.1. First quarter meeting will include at a minimum a review of ATSDR's progress for the previous fiscal year.

7.11.2. Second quarter meeting will include at a minimum review and establishment of the next fiscal year priorities.

7.11.3. Third quarter meeting will at a minimum review current fiscal year progress and review the APOW for the next fiscal year.

7.12. Coordinates the execution and review of toxicological profiles prepared under the MOU.

7.12.1. Coordinates nomination of candidates for profile development, as required under the MOU, with the ATSDR Component Working Group.

7.12.2. Coordinates initiation of research program, as required by the MOU with the ATSDR Component Working Group.

7.13. Establishes allocation of ATSDR indirect and shared costs and distributes allocation to ATSDR by 15 September each year.

8. Component ATSDR Liaison Officer:

8.1. Develops Component ATSDR program and coordinates between the DOD ATSDR Lead Agent, ATSDR, and their Component.

8.2. Coordinates and reports on ATSDR activities for the Components.

8.3. Provides oversight of ATSDR activities within the Component and apprises Component Secretary and the DOD Lead Agent of these activities.

8.4. Provides the best available information on the installations included which is necessary for ATSDR supporting activities in the APOW to ATSDR and ensures ATSDR publications reflect accurate interpretation and use of the information provided.

8.5. Activities include, but are not limited to, cooperation with site visits, data collection and exchange, document review, participation in professional meetings, and participation intra-agency and public forums.

8.6. Develops budget estimates for the resources to support ATSDR activities for the Component. Includes requests for resources to support ATSDR requirements and recommendations in the budget submittals for the Component's ERA, the BRAC Account, and other appropriations, where appropriate.

8.7. Provides funding to ATSDR through the USACHPPM.

8.8. Participates in the three ATSDR progress review meetings and ATSDR Component Working Group meetings with Lead Agent, as described in Section 7.11.

8.9. Monitors progress on implementation of Guidelines to include recommendations and follow-up activities.

8.10. Maintains repository for ATSDR documentation for their Component to include official correspondence and copies of all health consultations, public health assessments, health studies, petition letters and health education.

8.11. Coordinates changes to the APOW through the DOD Lead Agent that includes adding health assessments, health consultations, petitions, chemical consultations, health studies and health education programs.

8.12. Coordinates the review of mandated toxicological profiles by their Component. Components should identify requirements and resources for new toxicological profiles to DOD Lead Agent for incorporation into the APOW.

Section C ATSDR Activities

ATSDR performs functions included in the MOU (Appendix A)

9. Public Health Assessments & Health Consultations:

9.1. ATSDR may initiate health consultations based on findings during a public health assessment, in response to a petitioned request, or at the request of a DOD component or regulatory agency.

9.2. Component ATSDR Liaison Officers may request a health consultation at any time to address a public health concern, regardless of what is scheduled in the APOW, provided sufficient funds are available.

9.2.1. The Component should submit the request for a health consultation to ATSDR and to the DOD Lead Agent. ATSDR will respond with a cost estimate.

9.2.2. ATSDR and the DOD Lead Agent will approve request for a health consultation based on funding availability and schedule impacts.

10. Petitions:

10.1. Private citizens, licensed physicians, or groups can petition ATSDR for evaluations of perceived public health threats from hazardous waste sites.

10.2. ATSDR evaluates each petition and determines the appropriate response action.

10.2.1. Response actions may include health consultations, PHAs, or decisions of “no action necessary.”

10.2.2. ATSDR will determine if additional resources are necessary to respond to the petition.

10.3. ATSDR informs DOD Lead Agent of petitions when they are received; however, the petitioner remains anonymous.

10.4. DOD Lead Agent then informs Component Liaison Officer of the petition and resource requirements, as applicable.

11. Toxicological Profiles:

11.1. Toxicological profiles for DOD are centrally managed by the DOD Lead Agent with assistance from ATSDR Component Working Group.

11.2. Components should identify requirements and resources for toxicological profiles to DOD Lead Agent for incorporation into the APOW.

11.3. Component ATSDR Liaison Officers may request a chemical consultation at any time to address a public health concern, regardless of what is scheduled in the APOW, provided sufficient funds are available.

11.3.1. The Component should submit the request for a chemical consultation to ATSDR and to the DOD Lead Agent. ATSDR will respond with a cost estimate.

11.3.2. ATSDR and the DOD Lead Agent will approve request for a chemical consultation based on funding availability and schedule impacts.

12. Public Health Emergency Response:

12.1. Components may request ATSDR assistance in cases of public health emergencies caused, or believed to be caused, by exposure to toxic substances.

12.2. Components will coordinate with the DOD Lead Agent and ATSDR, as soon as possible after initiating an emergency response, to ensure appropriate funding is available.

GLOSSARY OF REFERENCES, ABBREVIATIONS, ACRONYMS, AND TERMS

References:

Memorandum of Understanding between the Department of Defense and the Agency for Toxic Substances and Disease Registry, 14 June 1993, extended to 30 September 2000, by amendment dated 29 September 1995.

Comprehensive Environmental Response, Compensation and Liability Act of 1980

Superfund Amendments and Re-authorization Act of 1986

Guidelines for Coordination of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Activities between Agency for Toxic Substances and Disease Registry and Department of Defense, February 1995.

Abbreviations and Acronyms

Abbreviation or Acronym	Definition
APOW	Annual Plan of Work
ATSDR	Agency for Toxic Substances and Disease Registry
BRAC	Base Realignment and Closure
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act of 1980
DASA ESOH	Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health)
DLA	Defense Logistics Agency
DOD	Department of Defense
DODI	Department of Defense Instruction
DUSD(ES)	The Deputy Under Secretary of Defense (Environmental Safety)
EPA	Environmental Protection Agency
ERA	Environmental Restoration Account
MOU	Memorandum of Understanding
NPL	National Priorities List
PHA	Public Health Assessment
SARA	Superfund Amendments and Re-authorization Act of 1986
USACHPPM	US Army Center for Health Promotion and Preventive Medicine

Terms

Health Consultations -- Focused assessments designed to address specific public health concerns, pertaining to hazardous substances or a hazardous waste site. Public health assessments and health consultations can lead to other ATSDR activities (i.e., health studies, health education, etc.).

Public Health Assessment (PHA) -- Complex evaluations of public health based on site visits, environmental data, health outcome data, and public health concerns. The assessment determines if a hazardous waste site has a past, present, or potential future adverse effect on human health. It may be used to develop health advisories, or identify studies and actions needed to evaluate, mitigate or prevent adverse human health effects.